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9 *Attorneys for Plaintiff, Deutsche Bank National Trust Company, Formerly Known as Bankers
10 Trust Company of California, N.A., as Trustee for American Home Mortgage Investment Trust
11 2005-2*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 DEUTSCHE BANK NATIONAL TRUST
15 COMPANY, AS TRUSTEE, IN TRUST FOR
16 THE REGISTERED HOLDERS OF
17 MORGAN STANLEY ABS CAPITAL I INC.
18 TRUST 2006-HE7, MORTGAGE PASS-
19 THROUGH CERTIFICATES, SERIES 2006
20 HE7,

21 Plaintiff,

22 vs.

23 FIDELITY NATIONAL TITLE GROUP,
24 INC.; FIDELITY NATIONAL TITLE
25 INSURANCE COMPANY; DOE
26 INDIVIDUALS I through X; and ROE
27 CORPORATIONS XI through XX, inclusive,

28 Defendants.

Case No.: 2:20-cv-01886-GMN-BNW

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO MOTIONS TO DISMISS [ECF Nos. 6
& 7]**

[First Request]

22 COMES NOW Plaintiff Deutsche Bank National Trust Company, Formerly Known as
23 Bankers Trust Company of California, N.A., as Trustee for American Home Mortgage
24 Investment Trust 2005-2 (“Deutsche Bank”), Defendant Fidelity National Title Insurance
25 Company (“FNTIC”) and Specially-appearing Defendant Fidelity National Title Group, Inc.
26 (“FNTG”) (collectively, the “Parties”), by and through their respective attorneys of record,
27 hereby stipulate and agree as follows:
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1. On September 24, 2020, Deutsche Bank filed its Complaint in Eighth Judicial District Court, Case No. A-20-821944-C [ECF No. 1-1];
 2. On October 8, 2020, FNTIC filed a Petition for Removal to this Court [ECF No. 1];
 3. On October 8, 2020, FNTIC filed its Amended Petition for Removal [ECF No. 2];
 4. On October 20, 2020, FNTIC filed a Motion to Dismiss [ECF No. 6];
 5. On October 20, 2020, FNTG also filed a Motion to Dismiss [ECF No. 7]
 6. Deutsche Bank’s deadline to respond to FNTIC’s and FNTG’s Motions to Dismiss is currently November 3, 2020;
 7. Deutsche Bank’s counsel is requesting a thirty day extension until Thursday, December 3, 2020, to file its response to FNTIC and FNTG’s Motions to Dismiss;
 8. This extension is requested to allow counsel for Deutsche Bank additional time to review and respond to the points and authorities cited to in the pending Motions;
 9. Counsel for FNTIC and FNTG does not oppose the requested extension;

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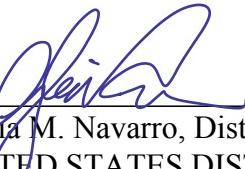
1 10. This is the first request for an extension which is made in good faith and not for
2 purposes of delay.

3 **IT IS SO STIPULATED.**

4 DATED this 3 rd day of November, 2020. 5 WRIGHT, FINLAY & ZAK, LLP 6 <i>/s/ Lindsay D. Robbins</i> 7 Darren T. Brenner, Esq. 8 Nevada Bar No. 8386 9 Lindsay D. Robbins, Esq. Nevada Bar No. 13474 7785 W. Sahara Ave., Suite 200 Las Vegas, NV 89117 10 Attorneys for Plaintiff, Deutsche Bank National Trust Company, Formerly Known as Bankers Trust Company of California, N.A., as Trustee for American Home Mortgage Investment Trust 2005-2	4 DATED this 3 rd day of November, 2020. 5 SINCLAIR BRAUN LLP 6 <i>/s/ Kevin Sinclair</i> 7 Kevin Sinclair, Esq. 8 Nevada Bar No. 12277 16501 Venture Boulevard, Suite 400 Encino, California 91436 9 Attorneys for Defendants, Fidelity National Title Group, Inc. and Fidelity National Title Insurance Company
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15 **IT IS SO ORDERED.**

16 Dated this 3 day of November, 2020.

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Gloria M. Navarro, District Judge
20 UNITED STATES DISTRICT COURT

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